

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Defining Primary Lines)

CC Docket No. 97-181

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COMMENTS OF AMERITECH

Ameritech¹ submits these comments in response to the Commission's further notice of proposed rulemaking in the above captioned matter.² In the FNPRM, the Commission solicits comments on its proposal to treat as "primary" one residential line per location that is used by hearing or speech impaired persons in conjunction with a text telephone ("TTY") regardless of whether another line at that location is also treated as primary for residents without such disabilities.³

Ameritech makes no opinion in this filing about the propriety of the new subsidy that the Commission proposes -- including whether it is consistent with principles articulated in §254 of the 1996 Act. Any shortfall resulting from Comments of Ameritech charging a lower primary residential subscriber line charge ("SLC") or primary interexchange carrier charge ("PICC") would be treated simply as another subsidy in the common line basket and recovered in other SLC and PICC (and possibly carrier common line) rates.⁴

¹ Ameritech means Ameritech Illinois, Ameritech Indiana, Ameritech Michigan, Ameritech Ohio, Ameritech Wisconsin.

² *In the matter of defining primary lines*, CC No. 97-181, Report and Order & Further Notice of Proposed Rulemaking, FCC 98-28 (released March 10, 1999) ("FNPRM").

³ FNPRM at ¶43.

⁴ Ameritech assumes that such a TTY line would be considered "primary" for both SLC and PICC purposes. To hold otherwise would involve significant implementation problems since there would be a discontinuity between the number of primary residential SLCs and primary residential PICCs.

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However, because the proposal would necessitate significant changes to billing, service order processing, and service provisioning systems that would currently conflict with Ameritech's Y2K efforts, Ameritech respectfully requests that the Commission delay implementation of its proposal until no earlier than the end of the second quarter, 2000.

Today, there are system edits in Ameritech's billing, service order processing, and service provisioning systems which require that only one line at any service location be treated as "primary residential." Where more than one line exists at any address, the edits direct how to decide which line should be treated as primary. All other lines are rated as non-primary lines and are marked accordingly. These edits in all three types of systems would need to be revised to recognize a new exception to permit more than one primary line at a location at which there is a TTY user.

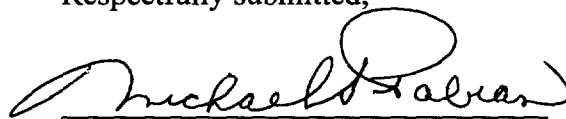
A new FID (field identifier) code would need to be created to identify TTY lines otherwise identified as non-primary. Additional edits would be required for billing systems to enable them to read for the existence of the FID and to apply the primary line SLC instead of the non-primary line SLC.

Also a process would need to be created to add the new TTY FID to appropriate lines as they are identified. Adjustments to business office service representatives' desktop screens, located within Ameritech's ASON+ service order processing system, would need to be implemented in order to permit the marking of lines with the new FID. Similarly, modifications to the adjunct service order processing system used by direct marketing centers would also need to be made to accommodate the new FID.

As primary lines are disconnected, a follow up process exists today in provisioning and billing systems which reads for the existence of remaining lines at the same service address (all marked as non-primary) and changes one of the remaining lines back to primary. An exception would need to be loaded into these systems in order to accommodate more than one primary line at a single service address where there is a TTY user.

Ameritech's current Y2K compliance efforts are, naturally, the primary focus of its IT personnel and will continue to be the primary focus through the end of the first quarter, 2000. Because of this, Ameritech requests that the Commission not require the implementation of any changes associated with the FNPRM until the end of the second quarter, 2000. After Ameritech's Y2K compliance efforts are complete -- approximately the end of the first quarter, 2000 -- Ameritech's IT personnel could focus on the types of changes described above which would be necessary to implement the Commission's proposal. Those changes could probably be completed by the end of the second quarter, 2000. Therefore, Ameritech respectfully requests that the Commission not require the implementation of any such changes until that time.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael S. Pabian", written over a horizontal line.

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Dated: April 9, 1999
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CERTIFICATE OF SERVICE

I, Grace Germain, do hereby certify that a copy of the Comments of Ameritech has been served on the parties listed on the attached service list, via first class mail, postage prepaid, on this 8th day of April, 1999.

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